

1 QUINN EMANUEL URQUHART & SULLIVAN, LLP
2 Charles K. Verhoeven (Bar No. 170151)
3 charlesverhoeven@quinnemanuel.com
4 David A. Perlson (Bar No. 209502)
5 davidperlson@quinnemanuel.com
6 Melissa Baily (Bar No. 237649)
7 melissabaily@quinnemanuel.com
8 John Neukom (Bar No. 275887)
9 johnneukom@quinnemanuel.com
10 Jordan Jaffe (Bar No. 254886)
11 jordanjaffe@quinnemanuel.com
12 50 California Street, 22nd Floor
13 San Francisco, California 94111-4788
14 Telephone: (415) 875-6600
15 Facsimile: (415) 875-6700

16 Attorneys for WAYMO LLC

17 UNITED STATES DISTRICT COURT

18 NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION

19 WAYMO LLC,

20 CASE NO. 3:17-cv-00939-WHA

21 Plaintiff,

22 **DECLARATION OF JEFF NARDINELLI**

23 vs.

24 UBER TECHNOLOGIES, INC.;
25 OTTOMOTTO LLC; OTTO TRUCKING
26 LLC,

27 Defendants.

28

1 I, Jeffrey W. Nardinelli, hereby declare as follows.

2 1. I am a member of the bar of the State of California and an associate with Quinn
3 Emanuel Urquhart & Sullivan, LLP, counsel for Plaintiff Waymo LLC (“Waymo”). I make this
4 declaration of personal, firsthand knowledge, and if called and sworn as a witness, I could and
5 would testify competently as follows.

6 2. Attached as Exhibit 1 is a true and correct copy of an email sent by Jordan Jaffe
7 and May 25, 2017.

8 3. Attached as Exhibit 2 is a true and correct copy of an email sent by Andrea Roberts
9 on June 8, 2017.

10 4. Attached as Exhibit 3 is a true and correct copy of excerpts of Waymo’s Second Set
11 of Expedited Requests for Production, served in this action on May 26, 2017.

12 5. Attached as Exhibit 4 is a true and correct copy of excerpts of Waymo’s Third Set
13 of Requests for Production, served in this action on May 31, 2017.

14 6. Attached as Exhibit 5 is a true and correct copy of an email and attachment
15 received from Betsy Popken on August 4, 2017.

16 7. Attached as Exhibit 6 is a true and correct copy of excerpts from a document
17 produced by Uber in this action bearing Bates number UBER00155960.

18 8. Attached as Exhibit 7 is a true and correct copy of an email sent by James Judah on
19 August 4, 2017.

20 9. Attached as Exhibit 8 is a true and correct copy of a document produced by
21 Anthony Levandowski in this action bearing Bates number LEV_002310.

22 10. Attached as Exhibit 9 is a true and correct copy of a document produced by
23 Anthony Levandowski in this action bearing Bates number LEV_002242.

24 11. Attached as Exhibit 10 is a true and correct copy of a document produced by Uber
25 in this action bearing Bates number UBER00073820.

26 12. Attached as Exhibit 11 is a true and correct copy of a document produced by Uber
27 in this action bearing Bates number UBER00073811.

28

1 I declare under penalty of perjury under the laws of the State of California that the
2 foregoing is true and correct.

3 DATED: August 7, 2017

4 /s Jeff Nardinelli

Jeff Nardinelli

5

6 **SIGNATURE ATTESTATION**

7 Pursuant to Local Rule 5-1(i)(3), I attest under penalty of perjury that concurrence in the
8 filing of this document has been obtained from Jeff Nardinelli.

9

10 /s/ Charles K. Verhoeven

11 Charles K. Verhoeven

12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28